

~~Joseph M. Ross & Associates~~

Attorney At Law

26 Court Street, Suite 2810
Brooklyn, New York, 11242
(718) 852-9100

29 September 2010

Hon. Judge Nicholas Garaufis
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
VIA FACSIMILE ONLY (718) 613-25461:09-CR-00672-NGG
USA v. Bana, et al

*Application denied for the
reissue set forth in the
government's letter of 9/30/10.
So ordered. s/Allyne R. Ross VSDJ
10/1/10*

Dear Judge Garaufis,

As you are aware, our offices represent Vito Pipitone with respect to the above referenced matter. *cc: counsel
PTSO Illaria*

We are forwarding this correspondence in furtherance of our request that Mr. Pipitone's bond be modified to allow for travel to celebrate his one year wedding anniversary as follows: *Judge Garaufis*

Departure from his residence at noon on Saturday 2 October 2010 to drive to the Tropicana Hotel in Atlantic City, New Jersey with a return home at 3PM on Monday 4 October 2010.

By way of background, Mr. Pipitone was arrested in the instant matter upon his arrival in Hawaii for his honeymoon approximately one year ago. He was immediately returned to this District. As such, he and his wife have yet to have any type of honeymoon.

In addition, Mr. Pipitone has just pleaded guilty to the instant Indictment and is awaiting sentence before Your Honor on 19 November 2010.

Please note that the Office of Pre-Trial Services (through P.T.S.O. Michael Illaria) has no objection to the instant request.

The previously assigned A.U.S.A. (Nicole M. Argentieri) in this matter is presently unavailable on maternity leave. The new assistant assigned to this matter (A.U.S.A. Steve Frank) has however objected to Mr. Pipitone's proposed anniversary plans.

Thank you for your continued consideration in this matter.

Very truly yours,



Joseph Mure, Jr., Esq.

SO ORDERED

Hon. Judge Nicholas Garaufis

JOSEPH MURE JR. & ASSOCIATES

26 COURT STREET - SUITE 2810 - BROOKLYN NY 11242

Tel: (718) 852-9100 - Fax: (718) 797-5554

FACSIMILE TRANSMITTAL SHEET

TO: HON. JUDGE NICHOLAS GARAUFI
CC: AUSA STEVE FRANK

FROM: JOSEPH MURE JR.

COMPANY:

DATE:

FAX NUMBER: 718 613 2546
CC: 718 254 6478

TOTAL NO. OF PAGES INCLUDING COVER: 3

SENDER'S REFERENCE NUMBER:

RE:

YOUR REFERENCE NUMBER:

(URGENT) ☒ FOR REVIEW (PLEASE COMMENT) (PLEASE REPLY) (PLEASE RECYCLE)
NOTES/COMMENTS:

CONFIDENTIALITY NOTE: The information contained in the facsimile transmission is privileged and confidential and intended only for the use of the addressee. If the reader of this message is not the intended recipient you are hereby notified that any unauthorized use, disclosure, distribution or copying of this facsimile is strictly prohibited. If you have received this facsimile in error please immediately notify us by telephone and return the same to the address via the United States Postal Service.